

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997 )

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS CHRISTOPHER S. BREHM  
(OCA/USPS-T21-1-4)  
September 17, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

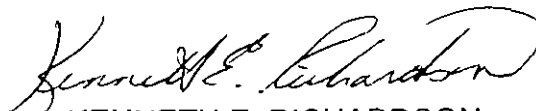
Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



KENNETH E. RICHARDSON

Attorney

OCA/USPS-T21-1. Please refer to your testimony at page 20 and the footnotes to table 4 discussing the marginal increases in window transaction time for window activities.

- a. The percent of total transactions, footnote 1, references exhibit USPS-21B.

*Please explain how the percentages are determined from that exhibit.*

- b. Footnote 2 references table 5 as the source of the multiple element average transaction time. Please explain how the multiple element transaction time is calculated from table 5.

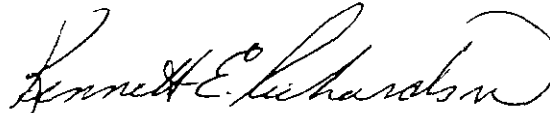
OCA/USPS-T21-2. Please refer to table 6 in your testimony. Please confirm that footnote 2, which refers to table 7, should be table 5. If not, please explain.

OCA/USPS-T21-3. Please refer to your testimony at page 23. Footnote 31 states that a variability of 78.53 percent originally calculated for express mail was included in the base year calculation and that the recent variability calculation of 83.15 percent as shown on your table 6 raises the volume variability for express mail costs by \$902,000. In your opinion should the 83.15 percent variability be used by witness Alexandrovich in his base year cost study? If not, please explain.

OCA/USPS-T21-4. Please confirm that in your testimony on page 6, line 18, the first reference to "staffing time" should read "processing time." If not, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

A handwritten signature in black ink, reading "Kenneth E. Richardson". The signature is fluid and cursive, with a large, stylized "K" and "R".

KENNETH E. RICHARDSON  
Attorney

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